

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

In re:

SEARS HOLDINGS CORPORATION, *et al.*

Debtors.¹

Chapter 11

Case No: 18-23538 (RDD)

(Jointly Administered)

-----X

**NOTICE OF APPEARANCE, REQUEST FOR NOTICES
AND DEMAND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Lawrence W. Byrne, Esq. hereby appears in the above-captioned case pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) as counsel to William Juiris, and requests, pursuant to Bankruptcy Rules 2002, 9007, and 9010 and sections 342 and 1109(b) of chapter 11, title 11 of the United States Code (the “Bankruptcy Code”), that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon the undersigned at the following office address, telephone number and e-mail address:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E Factory Service, LLC (6695); A&E Home Delivery, LLC (0205); A&E Lawn & Garden, LLC (5028); A&E Signature Service, LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); Private Brands, Ltd. (4022); Sears Development Co. (6028); Sears Holdings Management Corporation (2148); Sears Home & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC. (5554); Sears Protection Company (Florida), L.L.C. (4239); SHC Desert Springs, LLC (None); SOE, Inc. (9616); StarWest, LLC (5379); STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816). The location of the Debtors’ corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

Lawrence W. Byrne
John S. Delnero
Pedersen & Houpt
161 North Clark Street, Suite 2700
Chicago, Illinois 60601
T: 312-261-2155
lbyrne@pedersenhaupt.com
jdelnero@pedersenhaupt.com

PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the Bankruptcy Code, the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, facsimile transmission, e-mail or otherwise, which affect the Debtors or property of the Debtors.

This Notice of Appearance and Request for Service of Papers shall not be deemed to be a waiver of the appearing parties' rights (1) to have final orders in non-core matters entered only after *de novo* review by a District Court Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (4) to any other rights, claims, actions, setoffs, or recoupments to which the appearing parties are or may be entitled, in law or in equity, all of which rights, claims, actions, setoffs, and recoupments the appearing parties expressly reserve, or (5) to any and all defenses or objections the appearing parties may have to any claims asserted against it in this action including, without limitation, any defense based on insufficient service of process, jurisdiction (including personal jurisdiction), or capacity to be sued. The undersigned certifies that he/she is admitted to practice *pro hac vice* before this Court.

New York, New York

April 3, 2019

Respectfully submitted,

/s/ John S. Delnero
Lawrence W. Byrne, admitted *pro hac vice*
John S. Delnero
Pedersen & Houpt
161 North Clark Street, Suite 2700
Chicago, Illinois 60601

SERVICE LIST

Service Via First Class Mail

U.S. Trustee
United States Trustee
Office of the United States Trustee
Trustee for Region 2
[Attn: Paul Schwarzberg, Esq.)
U.S. Federal Office Building
201 Varick Street, Room 1006
New York, NY 10014

Adam M. Adler
Prime Clerk LLC
830 Third Avenue, 9th Floor
New York, NY 10022
Claims and Noticing Agent

Ray C. Schrock, Esq.
Jacqueline Marcus, Esq.
Sunny Singh, Esq.
Garrett A. Fail
WEIL, GOTHSCHAL, & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Attorneys for the Debtor

Ira S. Dizengoff
AKIN, GUMP, STRAUSS, HAUER & FELD, LLP
One Bryant Park
New York, NY 10036
Attorneys for the Creditor Committee

Stephen Sitley Esq.
Sears Holdings Corporation
3333 Beverly Road
Hoffman Estates, IL 60179

Paul D. Leake, Esq.
Skadden, Arps, Slate, Meagher & Flom LLP
4 Times Square
New York, NY 10036
*Attorneys for Bank of America, N.A., administrative agent
under the First Lien Credit Facility and the DIP ABL Agent*

Marshall S. Huebner, Esq.
Davis Polk & Wardell LLP
450 Lexington Avenue
New York, NY, 10017
Attorneys for Citibank, N.A., as administrative agent under the Stand-Alone L/C Facility

Sean A. O'Neal, Esq.
Cleary, Gottlieb
One Liberty Plaza
New York, NY, 10006
*Attorneys for JPP, LLC, as agent under the Second Lien
Credit Facility, IP/Ground Lease Term Loan Facility, and the Consolidated
Secured Loan Facility*

Eric R. Wilson, Esq.
Kelley Drye & Warren LLP
101 Park Avenue
New York, NY 10178
*Attorneys for Computershare Trust Company, N.A., as trustee for the Second
Lien PIK Notes, the Holdings Unsecured PIK Notes, and the Holdings
Unsecured Notes*

Edward M. Fox, Esq.
Seyfarth Shaw LLP
620 Eighth Avenue
New York, NY 10018
*Attorneys for Wilmington Trust, National
Association, as indenture trustee for the Second Lien Notes*

James Gadsden, Esq.
Carter Ledyard & Milburn LLP
2 Wall Street
New York, NY 10015
*Attorneys for The Bank of New York Mellon Trust
Company, as successor trustee for the SRAC Unsecured PIK Notes, SRAC
Unsecured Notes, and the SRAC Medium Term Notes*

Brian A. Raynor, Esq.
Locke Lord LLP
111 South Wacker Drive
Chicago, IL 60606
Attorneys for the Pension Benefit Guaranty Corporation